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United States District CourtSOUTHERNDISTRICT OFFLORIDA

UNITED STATES OF AMERICA

v.

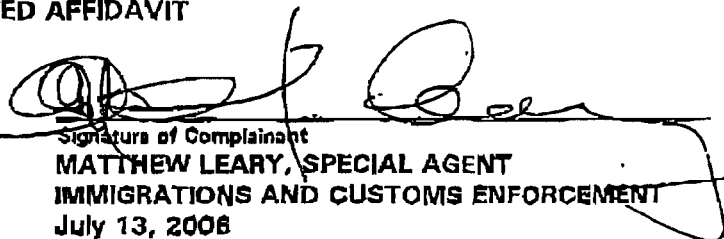
CRIMINAL COMPLAINTLUIS MEJIA,
SUARLI SALAZAR,
and
BERNARDO ALVARAO

CASE NUMBER: 06-27390MM

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From on or about April 24, 2006 to on or about June 24, 2006, in Miami-Dade and Broward Counties, in the Southern District of Florida, the defendants did knowingly and willfully forge, counterfeit, falsely make and possess documents prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, knowing them to be forged, counterfeited and falsely made; and, did knowingly and without lawful authority produce an identification document or false identification document, appearing to be issued by or under the authority of the United States; in violation of Title 18, United States Code, Sections 1028 and 1546(a).

I further state that I am a Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT



Signature of Complainant
MATTHEW LEARY, SPECIAL AGENT
IMMIGRATIONS AND CUSTOMS ENFORCEMENT
July 13, 2006

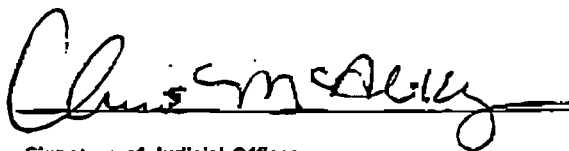
Sworn to before me, and subscribed in my presence,

JULY 13, 2006

Date

at Miami, Florida
City and StateCHRIS M. MCALEY
UNITED STATES MAGISTRATE JUDGE

Name and Title of Judicial Officer



Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Matthew J. Leary, Department of Homeland Security, Immigration and Customs Enforcement, being duly sworn depose and say:

1. I am a Special Agent with the Immigration and Customs Enforcement (ICE), and have been so employed for approximately three and half years. Prior to that, I was employed as a Special Agent for the United States Customs Service for approximately 17 years.

2. The statements contained in this affidavit are based upon my own personal knowledge, as well as information provided to me by other law enforcement officials and witnesses. I have not included in this Affidavit each and every fact and circumstance known to me, but only the facts and circumstances that I believe are sufficient to establish probable cause.

3. In April of 2006, information was received from a confidential source ("CS") indicating that a subject identified as Luis MEJIA, who possessed a Port Everglades identification badge and operated a scrap metal company operating out of Port Everglades, was selling and facilitating the sale of fraudulent resident alien and social security cards.

4. Thereafter, the CS was provided a contact cellular telephone number for Luis MEJIA, and on April 24, 2006, the CS called Luis MEJIA on his cellular telephone. During this conversation, which was electronically recorded, MEJIA told the CS that the cost of obtaining

the fraudulent documents was \$225.00. MEJIA further stated that his cousin, "Bernardo," actually produced the fraudulent documents.

5. On April 25 2006, the CS called Luis MEJIA for the purpose of purchasing fraudulent resident alien and social security cards. They made arrangements to meet at the National Recycling Company located at 9599 NW 87th Avenue, in Miami, Florida.

6. Later that day, the CS met with MEJIA, who introduced his cousin, Bernardo ALVARADO, to the CS. Thereafter, the CS gave a passport photograph of ICE Special Agent Jorge Gomez, and the fictitious personal identifiers of Alex Rodriguez, date of birth [REDACTED] 70, to Bernardo ALVARADO. This meeting was electronically recorded. After the meeting, the CS made a recorded telephone call to ALVARADO, wherein ALVARADO stated that the cost of the fraudulent documents would be \$225.00 for both a resident alien card and a social security card.

7. On May 15, 2006, the CS met with Luis MEJIA in the parking lot of the Sedano's Supermarket located at Northeast 183rd St. and 67th Avenue in Miami, Florida. There, the CS paid Luis MEJIA \$225.00 for the fraudulent cards. During this meeting, MEJIA told the CS not to talk about the cards or money on the telephone because he was committing a federal offense. MEJIA also stated that the "GUY" had to go to Homestead tomorrow. This meeting was electronically recorded.

8. On May 1st, 2006, the CS again met with Luis MEJIA at the Sedano's Supermarket, located at Northeast 183rd St. and 67th Avenue in Miami, Florida. During this meeting, MEJIA gave the CS a fraudulent resident alien card bearing the name of Alex RODRIGUEZ, date of birth [REDACTED] 70, with the passport photograph of Special Agent Jorge Gomez affixed, and a social security card in the name of Alex Rodriguez, bearing number [REDACTED] 8321. This meeting was electronically recorded.

9. On June 10, 2006 the CS again met with Luis MEJIA at the Sedano's Supermarket at Northwest 183rd Street and NW 67th Avenue in Miami, Florida. At this meeting, the CS gave MEJIA a passport photograph of ICE Special Agent Erick Hernandez as well as the personal identifiers of a fictitious person named Juan Martinez, with a date of birth of [REDACTED] 80 and \$225.00 for the fraudulent documents (resident alien and social security card). This meeting was also electronically recorded.

10. Immediately after the meeting between the CS and MEJIA, detectives observed MEJIA give a white envelope to a subject later identified as Suarli SALAZAR. Shortly after this meeting, the CS had a conversation with MEJIA wherein MEJIA told the CS that he handed the package to another subject.

11. During the subsequent surveillance of SALAZAR, MEJIA called the CS and told him that the documents were being produced in Homestead, Florida and that the fraudulent documents would be ready about 6:00 p.m. to 6:30 p.m. on June 10, 2006. Agents and

detectives then followed : ALAZAR to 15545 SW 302nd Terrace Homestead, Florida. Later, SALAZAR departed this residence and subsequently met with MEJIA in Hialeah, Florida. SALAZAR was then observed giving MEJIA an envelope, white in color.

12. After this meeting, MEJIA called the CS and told him he had the documents and to meet him again at the Seleno's Supermarket. The CS then met MEJIA in the parking lot area where MEJIA gave the CS : fraudulent resident alien card in the name of Juan Martinez bearing a date of birth of [REDACTED] 80 and the photograph of Special Agent Erick Hernandez, as well as a social security card in the name of Juan Martinez bearing number [REDACTED] 3428. This meeting was electronically recorded.

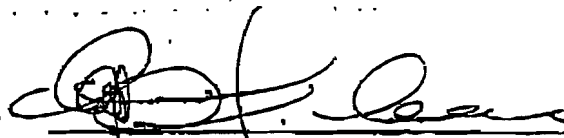
13. On June 24, 2006, the CS met with Luis MEJIA at the McDonald's Restaurant, located at 16701 NW 67th Avenue in Miami, Florida. This time, the CS gave MEJIA a Polaroid photograph of Detective Omar Mendez using the name Carlos Mendes and a date of birth of [REDACTED] 65, as well as \$375.00. This meeting also was electronically recorded.

14. MEJIA then departed this meeting and subsequently met with Suarli SALAZAR. The CS called MEJIA. MEJIA told the CS that the "GUY" is going to Homestead, Florida for the purpose of having the fraudulent documents made. SALAZAR was then observed by agents entering the residence at 15:45 SW 302nd Terrace, Homestead, Florida. After SALAZAR departed the residence, he again met with MEJIA. After this meeting, MEJIA met with the CS, wherein MEJIA gave the CS : resident alien card in the name of Carlos Mendes, bearing a date

of birth of [REDACTED] 65, as well as a social security card in the name of Carlos Mendes bearing number [REDACTED] 9671. This meeting was electronically recorded.

15. WHEREFORE, your affiant submits that there is probable cause for the arrest of the defendants, Luis MEIA, Suarli SALAZAR, and Bernardo ALVARADO, who did knowingly and willfully forge, counterfeit, falsely make and possess documents prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, knowing them to be forged, counterfeited and falsely made, in violation of Title 18, United States Code, Section 1546(a), and did knowingly and without lawful authority produce an identification document or false identification document, appearing to be issued by or under the authority of the United States, in violation of Title 18, United States Code, Section 1028(a)(1).

FURTHER AFFIANT SAYETH NAUGHT


Matthew J. Leary Special Agent
Immigration & Customs Enforcement

Sworn to before me this
13th day of July, 2006.


Hon. Chris McAuley
UNITED STATES MAGISTRATE JUDGE